

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

no later than Thursday, October 6, 2011, and Defendant's Reply to be filed no later than Wednesday, October 12, 2011.

Local Rule 7(I) provides that requests for an extension of time related to a motion must be in writing and that such requests are generally disfavored. In this case, Plaintiff's counsel requires just six more days to file Plaintiff's opposition. The parties will not be prejudiced by an extension of the filing deadlines. Moreover, the extension should not interfere with any other deadlines set for this case.

Additionally, the parties respectfully request a continuance of the hearing on Defendant's Motion to Dismiss, which is currently scheduled for October 14, 2011. Defendant's motion was originally noticed for hearing on October 7, 2011. Notice of Hr'g (Dkt. 10). Upon receipt of Defendant's motion and hearing notice, Plaintiff's counsel notified defense counsel of a scheduling conflict for that date. The parties agreed to file a joint motion requesting that the hearing be rescheduled for October 14, 2011. Joint Mot. to Continue Hr'g (Dkt. 14). On September 26, 2011, the Court granted the joint motion. Order (Dkt. 15).

Shortly after the joint motion was filed, defense counsel discovered that the attorney who will be arguing the motion is not able to attend the October 14 hearing due to a previously scheduled real-estate closing. Defense counsel immediately contacted Plaintiff's counsel to notify her of the conflict but did not reach her until after the joint motion had been filed. The parties then discussed the possibility of requesting a continuance of the hearing until October 21, 2011. Plaintiff's counsel confirmed her availability, and the parties agreed to move the Court for another continuance. Therefore, under Local Rule 7(G), the parties respectfully request a one-week continuance of the October 14, 2011, hearing.

Local Rule 7(g) provides in relevant part: “No continuance will be granted other than for good cause and upon such terms as the Court may impose.” Here, the parties request an extension due to defense counsel’s prior commitment on October 14, 2011—a commitment that cannot be rescheduled without considerable difficulty. Moreover, both parties are available for a hearing on October 21, 2011, neither will be prejudiced by the one-week delay, and the continuance will not otherwise interfere with the deadlines already set for this case.

WHEREFORE, the parties respectfully request the Court to (i) grant the joint motion for an extension of time to file, making Plaintiff’s Memorandum in Opposition due no later than Thursday, October 6, 2011, and the Defendant’s Reply due no later than Wednesday, October 12, 2011; and (ii) grant the joint motion to continue the October 14 hearing and reschedule it for Friday, October 21, 2011.

DATED: September 29, 2011

Respectfully submitted,

/s/ Rosanna C. Lopez  
Rosanna C. Lopez (VSB 70547)  
Lopez & Wu, PLLC  
1818 Library Street  
Suite 500  
Reston, VA 20190  
(703) 835-6145 – Tel.  
(703) 831-0181 – Fax  
*Counsel for Shirley Souryal*

/s/ David B. Deitch  
David B. Deitch (VSB 74818)  
Ifrah PLLC  
1717 Pennsylvania Avenue NW  
Suite 650  
Washington, DC  
(202) 524-4140 – Tel.  
(202) 524-4141 – Fax  
*Counsel for Torres Advanced Enterprise  
Solutions, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of September, 2011, the foregoing Joint Motion for an Extension of Time to File and a Continuance of the Hearing on Defendant's Motion to Dismiss was filed electronically using the Court's CM/ECF system, which will send notification of such filing to the following counsel of record:

Rosanna C. Lopez  
Lopez & Wu, PLLC  
1818 Library Street  
Suite 500  
Reston, VA 20190  
(703) 835-6145 – Tel.  
(703) 831-0181 – Fax  
*Counsel for Shirley Souryal*

David B. Deitch  
Ifrah PLLC  
1717 Pennsylvania Avenue NW  
Suite 650  
Washington, DC  
(202) 524-4140 – Tel.  
(202) 524-4141 – Fax  
*Counsel for Torres Advanced Enterprise Solutions, LLC*

/s/ David B. Deitch